

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007911, State: DC, Program Year: 2018)

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This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

Provide a description of the definition of income used to determine eligibility

The Department of Energy and Environment (DOEE) will weatherize dwelling units whose occupants are at or below 200% of the Federal Poverty Level or 60% of the District median income level, whichever is higher, as determined under the Weatherization Assistance Program (WAP) eligibility guidelines. Applicants who do not meet the income guidelines may receive weatherization assistance if they or any member of their household receives Supplemental Security Income or Aid to Families with Dependent Children.

Applicants must provide proof of income for all household members, which includes: recent payroll stub or other evidence that shows current gross income for the last 30 days and is valid within the last 90 days; documentation showing income from Social Security, unemployment insurance, pension funds, disability, etc.; proof of present address (e.g., rent receipt, lease or deed, property tax bill); proof of total members living in the household (e.g., birth certificates, school records); social security cards (or documents with Social Security number, such as a pay stub or birth certificate) for all persons living in the household; proof of US citizenship or permanent residence; and government issued photo identification. These requirements are for both single and multifamily dwellings.

The program operates on a first-come, first served basis and will give priority to households with the following characteristics (per 10 CFR § 440.1):

- Applicants over 60 years of age,
- Families with one or more members with a disability,
- Families with children under age 18,
- High residential energy users, or
- Households with a high energy burden.

Additional documentation may be requested before the Energy Assessment to confirm priority status.

Once the client's information is forwarded to the subgrantee, the subgrantee may also give priority to clients who fall into the following categories:

- Emergency: A client is considered to be in an emergency situation when a genuine emergency exists which poses an imminent threat to the life, health, or property of the client, and when that emergency situation can be corrected by WAP services, and when other options to correct or alleviate the threat are unavailable or impractical.
- State or Federal declaration of a disaster: In an instance that warrants the designation of an area as a disaster area, clients identified in that area may be offered general or specific services on a priority basis.

Describe what household eligibility basis will be used in the Program

DOEE will weatherize dwelling units whose occupants are at or below 200% of the Federal Poverty Level or 60% of the District median income level, whichever is higher, as determined by the WAP eligibility guidelines. Applicants who do not meet the income guidelines may receive weatherization assistance if they or any member of their household receives Supplemental Security Income or Aid to Families with Dependent Children.

Once the applicant is approved for weatherization-based on income and/or household demographics, home ownership is verified through the District's Office of the Chief Financial Officer (OCFO) Real Property Tax Database. If the applicant resides in a rental property, the owner is contacted to verify the signature on the application. Also, the applicant's address is researched to ensure that they have not received Weatherization Assistance since 1994 and to determine if the property is classified as historical through the District's Office of Planning Property Quest Database.

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

The process of determining eligibility for weatherization services begins with clients submitting the necessary documentation to confirm household composition, household income, and sources of income received. DOEE is in compliance with Federal requirements and ensures that services are provided only to U.S. citizens or qualified aliens.

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“Qualified aliens” are defined in Section 431 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), commonly known as the welfare reform law. The PRWORA covers the larger groups of legal immigrants (legal permanent residents, refugees, asylees, individuals paroled into the U.S. for at least one year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse). Qualified aliens are eligible to receive assistance and services, so long as they can provide the following documents: Picture ID, Social Security card, proof of household income and utility bills.

DOEE’s services are in full compliance with Federal provisions related to verification of qualified alien status. DOEE’s procedures for verifying applicants’ U.S. citizenship or immigration status are in accordance with the United States Department of Justice’s (US DOJ) Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, published November 17, 1997 (62 FR 61344).

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

DOEE’s process is consistent with United States Department of Energy (US DOE) Regulations, which allow grantees to use LIHEAP eligibility criteria as the basis of eligibility under WAP, provided that the LIHEAP basis is at least 200% of the federal poverty level or 60% of the District’s median income level. Because WAP and LIHEAP are housed in the same office at DOEE, DOEE can closely monitor the low-income households that have been certified as eligible by LIHEAP staff.

Verification of the household income and WAP eligibility are recorded as part of the client’s file.

Describe Reweathering compliance

The American Recovery and Reinvestment Act (PL 1115) amended the US DOE weatherization requirements to allow for the re-weatherization of homes that were originally weatherized before September 30, 1994. This provision allows DOEE the flexibility to revisit homes weatherized before September 30, 1994, that may not have received the full complement of weatherization services, including the use of an advanced energy audit. It also allows DOEE to determine if the households have weatherization related health and safety concerns.

Reweathering is also allowed under 10 CFR 44.18(e)(2)(ii) if a “dwelling unit has been damaged by fire, flood, or act of Nature and repair of the damage to weatherization materials is not paid for by insurance.”

Describe what structures are eligible for weatherization

DOEE exercises caution in dealing with nontraditional type dwelling units such as shelters and apartments located over businesses to ensure that they meet program eligibility requirements. In a case in which DOEE determines that such a unit is eligible for weatherization, a request for approval will be sent to the US DOE Project Officer before commencing weatherization activities.

In a case in which DOEE is aware of pending redevelopment, the dwelling(s) will not be weatherized. To determine the timeframe, we will determine the payback for each measure. For example, if a measure has a SIR of 1 or more and the lifetime of the measure is 8 years; we will not address the property if it is slated for redevelopment within that timeframe.

Describe how Rental Units/Multifamily Buildings will be addressed

DOEE follows 10 CFR 440.22 when addressing rental units and multifamily buildings. Multifamily structures must contain, at a minimum, 66% low-income dwelling units. DOEE may provide an exemption to a large multifamily building if an initial energy assessment determines that the building offers significant energy savings and there is not a significant DOEE investment to be made. In these cases, as few as 50% of the total units need to be certified as eligible to proceed with weatherization services. Exemptions to the 66% rule will be considered on a case by case basis and sent to the US DOE Project Officer for prior approval.

Multifamily buildings must also have an agreement in place that prevents management from raising rents based solely on the WAP improvements. Owners are

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required to contribute up to 10% of the total expected costs for the installation of audit recommended measures. If leveraged funding is not available owners are required to buy down any recommended measures to be installed from the audit that does not have savings to investment ratio of at least 1. The 10% contribution can be funds allocated for additional weatherization services or proof of significant weatherization investment within the past year.

Unoccupied multifamily buildings may only be weatherized if they will become eligible dwelling units within 30 days of weatherization improvements to the building. These owners are required to enter into an agreement with the District of Columbia thirty (30) days before the date the improvements are to be installed. Owners have 180 days from the date of execution of this agreement to obtain the low-income tenancy rate required. If the low-income tenancy has not been obtained by the 180-day deadline, owners must reimburse the District for the weatherization measures installed. Buildings with only 20% low-income eligible tenant occupancy will adhere to the same policies as an unoccupied multifamily dwelling.

In cases where single-family dwelling units are occupied by renters, the renter must meet the eligibility requirements before weatherization work commencing. The owner of the dwelling unit must enter into an agreement that prevents raising rents based solely on WAP improvements. Owners may be required to contribute up to 25% of the WAP allocation for weatherization services.

Describe the deferral Process

Per Weatherization Program Notice 17-7 (WPN 17-7), units are deferred on a case by case basis. Reasons for deferral are identified at the time of the energy audit, or before weatherization work commencing. If an item(s) listed on the "Weatherization Assistance Program Applicant Notification of Deferral" is noticed before work begins, the client is not allowed to receive any measures from the weatherization assistance program until they address the issue. In addition to DOEE conducting the initial walk through subgrantees are required to perform an extensive walk through of each home to avoid work taking place in a dwelling with deferral concerns.

Deferred clients will receive the "Weatherization Assistance Program Applicant Notification of Deferral" (attached to SF424) which includes: an explanation of the nature of the deferral to include photographic documentation; the client's name and address; contact information for an appeal of the deferral decision; date of the audit/assessment; the date when the client was informed of the potential health and safety issues; and the signature of the Energy Auditor who conducted the audit. The client's signature is also required to indicate that the client understands his or her rights and options.

A copy of the deferral decision is given to the client, and a copy is placed in DOEE's client file. Once the client has resolved the deferral issues, they are eligible to reapply for the Weatherization Assistance Program and a second site visit is conducted to verify compliance.

In a case in which DOEE is aware of pending redevelopment, the dwelling(s) will not be weatherized. To determine the timeframe, we will determine the payback for each measure. For example, if a measure has an SIR of 1 or more and the lifetime of the measure is eight years; we will not address the property if it is slated for redevelopment within that timeframe.

V.1.3 Definition of Children

Definition of children (below age): **18**

V.1.4 Approach to Tribal Organizations

Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

The District of Columbia has no recognized tribal organizations.

V.2 Selection of Areas to Be Served

The entire District of Columbia will be served. Eligible properties and residents will receive assistance regardless of location within the District of Columbia. DOEE competitively selects local 501(c)(3) nonprofits as subgrantees. General selection criteria include:

1. Each subgrantee is a Community Action Agency (CAA) or other public or nonprofit entity
2. Each subgrantee is selected on the basis of public comment received during a public hearing conducted pursuant to § 440.14(a) and other appropriate

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findings regarding:

- a. The subgrantee's experience and performance in weatherization or housing renovation activities;
- b. The subgrantee's experience in assisting low income persons in the area to be served;
- c. The subgrantee's capacity to undertake a timely and effective weatherization program;
- d. In selecting a subgrantee, preference is given to any CAA or other public or nonprofit entity which has administered, or is currently administering, an effective program under the weatherization regulations or under title II of the Economic Opportunity Act of 1964, with program effectiveness evaluated by consideration of factors including, but not necessarily limited to, the following:
 - i. The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
 - ii. The quality of work performed by the subgrantee;
 - iii. The number, qualifications, and experience of the staff members of the subgrantee;
 - iv. The ability of the subgrantee to secure volunteers, training participants, public service employment workers, and other Federal or State training programs;
 - v. DOEE shall ensure that the funds received under this part will be allocated to the entities selected in accordance with the 10 CFR 440 and 600 and that funds will be allocated on the basis of the need for a weatherization project by low income persons; and
 - vi. Any new or additional subgrantee shall be selected at a hearing in accordance with §440.14(a) and upon the basis of the criteria in paragraph (a) of this section.

DOEE may terminate or reduce the grant award to a subgrantee if it determines that the subgrantee is not likely to implement the weatherization program fully, which includes the completion of all assigned dwelling units prior to the end of the grant period. Subgrantee awards that have not reported as complete within three months of dwelling unit assignments may be terminated and their financial assistance will be allocated to other subgrantees. A subgrantee that fails to implement and abide by the subgrantee award or seeks to circumvent established procedures may be terminated. All subgrantees receiving a notice of impending agreement termination will receive written notice during which time they will have an opportunity to appeal the decision against termination. This appeal is to be made to the DOEE Director or the Director's designee.

Applicants for the Weatherization Assistance Program are vetted by DOEE to ensure that inappropriate reweatherization does not happen. When the customer is contacted to schedule an energy audit: (a) they are asked if they have ever received services from DOEE or any other government entity; and (b) their address is matched in the DOEE weatherization database.

V.3 Priorities for Service Delivery

DOEE operates on a first come first served basis. In the event that a waiting list arises, DOEE gives preference to any one of the following:

- Applicants over 60 years of age
- Households with one or more members with a disability
- Household with children under age 18
- High residential energy households
- Households with high energy burden

Additional documentation may be requested before the Energy Assessment to confirm priority.

The average amount of WAP assistance per unit can be up to \$7,105 as of October 1, 2015.

V.4 Climatic Conditions

On average, the District of Columbia's weather ranges from approximately 11 degrees Fahrenheit in the winter months to 88 degrees Fahrenheit in late summer months. Temperature extremes range from below 10 degrees Fahrenheit to 100 degrees Fahrenheit. During the coldest months (December - March), the average temperature differential to overcome is 11 degrees Fahrenheit to maintain a minimal interior comfort level of 65 degrees Fahrenheit. The 30-year average for the District is 5409 degree days, made up of 3742 heating degree days and 1667 cooling degree.

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Washington DC Weather data

https://www.wunderground.com/history/airport/KDCA/2017/1/1/CustomHistory.html?dayend=31&monthend=12&yearend=2017&req_city=&req_state=&req_statename=&reqdb.zip=&reqdb.magic=&reqdb.wmo=

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

DOEE will conduct energy audits using a US DOE-approved audit tool in eligible dwellings participating in the Weatherization Assistance Program. After the audit is completed, DOEE prepares and assigns the work order to the subgrantee. The subgrantee will begin the Quality Control Inspection Process by conducting a visual inspection to ensure conformity with the work order. The subgrantee will review the work order, and in collaboration with DOEE Quality Control Inspector (QCI), they will monitor work in progress ensuring OSHA, lead-safe, and other requirements are being met. Once the work is completed, the subgrantee will conduct an inspection and submit supporting documentation to DOEE (uploaded to SF-424) stating the property is ready for QCI inspection. DOEE QCI will conduct the inspection and document whether it is a PASS or FAIL based on the SWS guidance. This information is submitted to the subgrantee for re-work or approval to bill based on QCI outcome. At the end of each quarter an assessment will be made by the Program Manager and QCI if additional training is needed based on the failure rate.

Some of the primary measures to be considered are:

1. air sealing infiltration reduction – infiltration reduction addresses air and heat movement between heated and unheated areas by applying such measures as caulking, foam sealant, insulation, weatherstripping to primary doors and windows, sealing of baseboards, correction of leaks in HVAC duct systems, and other materials as necessary to seal the envelope penetrations of the dwelling.
2. heating system efficiency improvements - HVAC systems are to be tuned up, as needed, to improve efficiency and indoor air quality. Should a dangerous health or safety condition exist as determined by a DOEE inspector with HVAC expertise, replacement rather than repair may be deemed necessary. In other cases, if age and condition of the system warrant, replacement rather than repair will be considered via a cost/benefit analysis.
3. attic insulation and venting - attics will be insulated to R49 if the SIR is equal to or greater than 1. Attics that are insulated must have a dam installed and be vented according to the District's Weatherization Field Guide.
4. insulation of domestic water heater - domestic hot water heaters will be insulated if required, and the hot water pipes extending from the water heater will be wrapped for a distance of at least six feet from the water heater, or, if exposed, the entire hot water line.
5. basement/floor/crawl space insulation - unheated basements will be insulated to R19. A vapor barrier will be installed where needed. Adequate ventilation will be provided for insulated basements and crawl spaces. For insulated basements within the building envelope, ventilation should be to the interior of the structure and not outside the envelope.
6. pipe and duct wrap - hot water pipes and hot air heating ducts located in unconditioned areas will be insulated.
7. storm windows – the installation of storm windows on primary windows between heated and unheated areas will be considered.
8. refrigerators - the National Energy Audit Tool (NEAT) includes a refrigerator replacement measure. NEAT can evaluate the potential savings obtained from replacing and existing refrigerator with a newer, more efficient unit. We will use the NEAT as our auditing tool and EPA guidelines for Energy Star Appliances to recommend refrigerator replacement. When refrigerators are replaced, subgrantees must provide a decommissioning certificate as evidence of proper disposal of the existing refrigerator. Replacement of through the door ice maker refrigerators or standalone freezers is considered.
9. central air conditioners – Air conditioners rated at 16 SEER or higher may be installed. New air conditioners use 30-50% less energy to produce the same amount of cooling as do air conditioners made in the 1970s. Even if the air conditioner is only ten years old, a customer could save 20-40% of cooling energy cost with a newer, more efficient model. This measure may also be considered under Health & Safety measures.
10. water heater replacement - the NEAT will evaluate the cost effectiveness of replacing an existing water heater with a higher efficiency model. This measure may also be considered under Health & Safety measures.
11. lighting – new lighting systems will be considered. The use of new lighting technology can reduce the lighting energy use in homes by 50-75%.

The work covered by WAP will be performed as needed in homes which are otherwise in sound repair. In some cases, extreme conditions exist (such as roof deterioration or plumbing related failures in heating distribution systems) which must be corrected before the US DOE funded measures can be justified.

Per 10 CFR 440.18(c)(ii) and 440.20, low-cost/no-cost weatherization materials may be distributed to eligible clients. These measures are intended to be installed by clients and serve them until such time that regular WAP weatherization measures can be installed by subgrantees.

All completed work will comply with: DOEE's US DOE-approved energy audit tool, Appendix A, DOEE's weatherization field guide, the Standard Work Specifications (SWS) and any/all other applicable federal or state requirements. All subgrantees will receive a copy of the DOEE Field Guide titled Standard Work Specifications Field Guide for Single-Family Homes created by Department of Energy and Environment in 2015 during the annual Energy Kickoff Meeting. They must follow the Guide's weatherization standards when installing an energy efficiency measure which incorporates the SWS of US DOE's Weatherization Program Notice (WPN) 15-4, Section 2. Subgrantees will acknowledge receipt of the Field Guide and agree to provide a copy to their subcontractors and in-house crews before they begin any weatherization work.

During the monitoring visit, subgrantees are required to submit to DOEE a copy of their subcontractors and vendor agreements to ensure contractors are aware and in compliance with US DOE technical requirements and specifications of work. Also, the work orders for the single and multifamily dwellings incorporate the particular Standard Work Specification (SWS) for each measure.

DOEE provides subgrantees with the technical requirements for field work including audits/testing; installation of energy conservation, health and safety and incidental repair measures; and final inspections. The subgrantee will confirm receipt of those requirements and provide follow-up and clarification upon request. The subgrantee will provide the same documentation to all contractors, subcontractors, and in-house personnel performing tasks in the Weatherization Assistance Program.

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DOEE verifies that the technical requirements are clearly communicated, and the specifications for work to be inspected will be referenced in subgrantee contracts. Contractors hired by the subgrantee will have agreements that include the same technical requirements referenced above. The work of the subgrantee and contractor are required to be consistent with the DOEE and US DOE standards and field guides.

The signed contracts must be submitted to DOEE during or before DOEE management's yearly monitoring visit to each subgrantee to ensure DOEE's continued compliance with the US DOE's Program Year 2016 requirements.

The DC Field Guide and SWS Alignment was approved by US DOE on October 2, 2015, please see links below:

For Single Family SWS click [here](#)

For Multifamily SWS click [here](#)

DOEE will submit an updated DC Field Guide for approval prior to 10/01/2018. DOEE submitted a request to our US DOE Project Officer to include Solar PV as an approved measure into our program. We are in the process of developing a detailed description of the proposal to deploy solar which demonstrates the cost effectiveness of solar PV. DC implemented a Solar Pilot Program in Program Year 2017 using 100% leveraged funds. We preparing the necessary paperwork to obtain US DOE approval for solar as an energy efficiency measure under the WAP program.

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Single-Family : NEAT audit approved by US DOE on January 12, 2016.

Manufactured Housing : Does Not Apply (DNA)

Multi-Family : TREAT audit approved by US DOE on January 12, 2016.

Comments

A US DOE approved audit will be conducted on each eligible dwelling by a qualified energy auditor. DOEE's Weatherization Request for Applications (RFA) and Subgrantee Award Notices state that the subgrantee may be requested to perform an energy audit at a cost not to exceed \$450 per unit, if needed. National Energy Auditing Tool (NEAT) audits are completed for all single family dwellings. Audit recommended measures are prioritized according to Savings to Investment Ratio (SIR) rankings.

The audit process includes a pre- and post-blower door reading and ensures that every participating home is given the best possible recommendations for energy conservation. DOEE ensures that each energy audit meets US DOE guidelines and is performed in each participating home by a qualified energy auditor. The purpose of the audit is to determine the most cost effective energy saving measures for each dwelling unit. Targeted Retrofit Energy Analysis Tool (TREAT) audits are completed for all multifamily buildings with five or more units. Audit recommended measures are prioritized according to Savings to Investment Ratio (SIR) rankings.

V.5.3 Final Inspection

US DOE requires that every dwelling unit receives a final inspection before being reported as a completed unit. US DOE also requests (per Weatherization Program Notice 15-4) that by the beginning of the US DOE 2015 Program Year, all units reported to US DOE as completed will have been inspected to ensure compliance with the specifications outlined in the SWS, and all quality control inspections, including final inspections and monitoring inspections, must be conducted and signed off on by certified Quality Control Inspectors (QCI).

QCI are individuals who have no involvement in the prior work as the energy auditor /assessor or as a member of the crew. All work orders are generated to include the specific corresponding SWS as an extra assurance that the subgrantee, subcontractor, and in-house crews install measures and perform work following the standard. Also, each report includes the following language "All contractors must perform lead-safe work practices and adhere to OSHA health and safety requirements. All weatherization work should be installed per DC Construction Code, US DOE SWS and DOEE's Field Guide. The QCI is solely responsible for monitoring and ensuring compliance of the work in progress to ensure all Occupational Safety and Health Administration (OSHA) and Lead Safe Work Practices. DOEE has taken on the role as the sole QCI.

Subgrantees will conduct final inspections on 100% of all dwelling units with DOEE conducting the official QCI inspection before reporting them as completed units. DOEE's internal QCI Inspector is required to certify that work for reported units was completed per the requirements of the 10 CFR 440 standards, DOEE Weatherization Field Guide, and applicable state codes. In addition, the QCI conducts in-progress inspections for all work performed under the

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DOEE and subgrantee quality checks are prerequisites to a payment of the subgrantee. For each job, however, the subgrantee must undertake a review that includes a signed Client Satisfaction Survey and a passed final inspection, using the subgrantee's Final Inspection Form. The Final Inspection Form addresses each installed measure. The customer and the inspector signatures are required.

The subgrantee is also charged with client education and submits documentation to ensure compliance. Subgrantees must provide DOEE with a work schedule to ensure that the following quality control objectives and job tasks are accomplished during DOEE's in-progress inspections:

Domain I: Conducting Quality Checks In Process Visual/Sensory Inspections

- Task 1: Verify worker compliance with safety rules
- Task 2: Assure employee professionalism
- Task 3: Address work problems
- Task 4: Evaluate client satisfaction regarding the in-process work

Domain II: Conducting Quality Checks Post Work Visual/Sensory Inspection

- Task 1: Review client file and the work scope
- Task 2: Perform an exterior and interior visual/sensory inspection
- Task 3: Evaluate customer satisfaction
- Task 4: Determine pass/fail of the work

Domain III: Conducting Quality Checks Post Work Diagnostic Inspections

- Task 1: Conduct health and safety tests
- Task 2: Conduct diagnostic tests
- Task 3: Identify work problems

Domain IV: Ensuring Worker Professionalism

- Task 1: Perform spot checks
- Task 2: Provide feedback regarding professionalism

Domain V: Ensuring Program or Project Compliance

- Task 1: Maintain professional credentials
- Task 2: Confirm the allocation of public/private funds
- Task 3: Evaluate installed measures against the field guide, SWS, and state/local codes
- Task 4: Close out the project
- Task 5: Maintain files and records

All subgrantee contracts must include the following language to ensure compliance with WPN15-4:

"All measures and incidental repairs performed on client homes must meet the specifications, objectives and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS).

These field standards must comply with or exceed the minimum standards described in the SWS including audits/testing; installation of energy conservation, health and safety and incidental repair measures; and final inspections. The contractor must confirm receipt of those requirements and provide follow-up and clarification upon request. A signature on a contract/award can serve as proof of receipt.

Dwelling Specific Requirements Below:

Also as part of DOEE's agreement with the subgrantee, they are required to ensure their contractors adhere to the guidance as outlined in the US DOE approved Field Guide and SWS Alignment and attend required training as outlined on the training plan uploaded to the SF-424.

V.6 Weatherization Analysis of Effectiveness

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Since the inception of the Weatherization Assistance Program, DOEE has utilized Subgrantees to weatherize over 10,000 dwelling units in the District of Columbia. Subgrantees have played an integral part in the success of the weatherization program through their many years of experience in residential energy efficiency improvement.

To keep an updated evaluation of each Subgrantee, DOEE utilizes Quickbase to monitor the following:

1. Number of homes completed
2. Number of applications pending
3. Number of homes in progress
4. Contract amount
5. Total funds expended
6. Balance of funds
7. Special comments

DOEE currently maintains the monitoring files, which include all the subcontracts and related information from which staff can obtain a current and complete financial picture.

Subgrantee performance is reviewed both periodically and at the end of the program year. In addition, we conduct weekly conference calls beginning in the third quarter to ensure program timelines are met.

DOEE, through the Energy Efficiency and Conservation Branch, places great emphasis on ensuring that the Weatherization Assistance Program is effective and efficient at all levels. DOEE conducts training and monitoring activities on an ongoing basis to evaluate Subgrantees' procedures, quality of work, and overall program management. Through this process, DOEE can adequately assess the training needs of Subgrantees' staff and subcontractors.

DOEE will require the subgrantee and its contractors to attend US DOE conferences and trainings, and WAP-run management and customer education training. The subgrantee must prove and maintain the supporting documentation that all field workers have successfully completed the following training courses prior to performing weatherization services:

Inspector

- BPI Building Analyst Certification
- Quality Control Inspection Certificate of Completion from an IREC Accredited Facility
- Moisture and Mold Awareness
- Envelope and Duck Leakage
- Lead Safe Work Practices
- 10 Hour OSHA
- ASHRAE 62.2-2016

Installer

- Retrofit Installer Technician Certificate of Completion from an IREC Accredited Facility
- HVAC Fundamentals Certificate of Completion from an IREC Accredited Facility
- HVAC Duct Sizing Certificate of Completion from an IREC Accredited Facility
- Moisture and Mold Awareness
- Envelope and Duct Leakage
- Lead Safe Work Practices
- 10 Hour OSHA
- ASHRAE 62.2-2016

Crew Chief

- BPI Building Analyst Certification
- Crew Leader Certificate of Completion from an IREC Accredited Facility
- 30 Hour OSHA
- Moisture and Mold Awareness
- Envelope and Duct Leakage
- Lead Safe Work Practices
- ASHRAE 62.2-2016

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The subgrantee(s) are local, so there are no US DOE funds budgeted for monitoring purposes. DOEE will utilize District Government Fleet vehicles at no cost to the US DOE grant. The program staff that conducts the field, programmatic and financial monitoring are currently being paid through other funding sources.

In an effort to monitor the work being completed by the subcontractors EECB staff conduct in-progress inspections for all program participants ensuring work is completed by certified/qualified staff, work is completed in sequential order, and clients are aware of the weatherization measures received.

Through field monitoring, DOEE conducts an analysis of the subcontractor/subgrantee's success in achieving or exceeding air infiltration target rates and addressing health and safety concerns.

This is also an opportunity for DOEE to determine if Tier 2 training is needed.

DOEE will strengthen the monitoring process by requiring subgrantees respond to monitoring reports with findings or numerous or repetitive observations that require not only documentation of correction of work deficiencies but also the actions that were taken or planned to ensure that similar deficiencies are not repeated in future weatherization work.

DOEE continues to guide subgrantee weatherization programs in the implementation of the revised procurement policies to ensure subgrantee's procurement is open and competitive. DOEE obtains weatherization pricing for the contractors at a fair market rate based on the current year's market analysis.

DOEE is continuing a comprehensive program evaluation to determine average energy savings of weatherized homes and its program effectiveness. Subgrantees are monitored for their production status on a monthly basis utilizing an online application called QuickBase.

V.7 Health and Safety

US DOE has mandated that states develop, publish, and implement procedures to allow the usage of WAP funds for health and safety risk mitigation. Energy-related health and safety concerns are those hazards that are necessary to be removed before, or because of, the installation of weatherization measures. Therefore, health and safety hazards associated with weatherization activities are allowed to be removed or prevented with US DOE funds. Measures and costs are defined in the grant award documents to avoid seriously impeding the realization of the primary energy conservation purpose of the program. DOEE will continue to be prudent in our oversight of the funds used by subgrantees for health and safety mitigation on homes weatherized.

DOEE has currently budgeted \$10,000 for health and safety costs and will expend an average of \$58.82 per unit using U.S. DOE funding. If the total health and safety costs exceed \$10,000, other funding sources will be used. DOEE will carefully monitor subgrantee expenditures to ensure that the amount allocated to address energy-related Health and Safety with an average cost of \$58.82 per unit. U.S. DOE will always be the second source of funding to address Health & Safety concerns.

Subgrantees must comply with Occupational Safety and Health Administration (OSHA) and Safety Data Sheets (SDS) requirements in all weatherization activities under the revised Hazard Communication Standard (HCS) 29 CFR 1910, 1200 (attached in SF 424), and take precautions to ensure the health and safety of themselves and others. Wherever workers or residents may be exposed to hazardous materials subgrantees, contractors, and subcontractors will develop and maintain a written hazard communication program conforming to the HCS 29 CFR 1910, 1200. Subgrantee, shall ensure that:

- All hazardous chemicals in the workplace are listed,
- All containers of hazardous chemicals are labeled;
- Safety data sheets are maintained for all hazardous chemicals, and
- Workers are informed and trained on program elements, hazards, and protective measures.

Also, subgrantees must adhere to the standards in DOEE's Health and Safety Plan. This is an additional check to ensure that expenditures are allocated appropriately.

A. Grantee Health and Safety (DOEE Staff)

Funds provided under 10 CFR 440.18 of the WAP regulations are to eliminate health and safety hazards, elimination of which is necessary before, or because of, installation of weatherization material. These funds are to be expended by subgrantees for direct weatherization activities.

B. Contractor and Crew Health and Safety (Subgrantees and Contractors)

Subgrantees must comply with Occupational Safety and Health Administration (OSHA) requirements for all weatherization activities subcontractors, contractors and in-house crews employed by subgrantees are expected to comply with OSHA. This requirement is a part of the subcontractor's bidding process. Related

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costs for subgrantees to comply with OSHA requirements are to be charged under a separate health and safety budget category.

C. Client Health and Safety

DOEE has considered the need to mitigate potential energy-related health and safety hazards occurring in client's homes. A list of the more common hazards and the preferred approach is discussed below. Other energy-related hazards may be considered on a case by case basis. The single most threatening and potentially serious hazards are related to combustion appliances. To address these hazards, DOEE requires energy auditors to test the combustion appliances in a home pre- and post-air tightening. This procedure consists of testing carbon monoxide levels in the flue/vent and near the exhaust of unvented appliances, draft-ability of flues, startup spillage at flues, adequacy of combustion air, and testing for fuel leaks.

D. Remediation Materials

Remediation materials are defined as materials, measures, and equipment necessary to reduce or eliminate existing or potential health and safety hazards. These include:

1. Replacement furnace;
2. Combustion device vent connector when original is rusted out or unable to safely vent the products of combustion from a combustion device;
3. Materials necessary to repair a downspout leaking into a basement and causing a moisture, mold and wood rotting problem;
4. Materials necessary to repair the section of a gutter causing a moisture, mold and wood rotting problem;
5. Materials necessary to address electrical hazards when the problem prevents adequate weatherization.

Allowed Measure and Estimated Cost

Installation/repair of exhaust fans in kitchens and bathrooms by ASHRAE 62.2 protocol	\$650.00
Correcting/repairing improper or ineffective HVAC venting (such as installing a chimney liner)	\$290.00
Repairing/replacing HVAC units in homes where at risk, medically certified/necessitated occupants dwell	\$600.00
Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions	\$100.00
Minor correction of moisture and mold creating conditions when necessary to ensure the long-term stability and durability of the weatherization measures and the clients' long-term health and safety	\$100.00
Minor electrical repairs/upgrades necessary for weatherization measures and where the health and safety of the occupant is at risk	\$300.00
Gutter or downspout work when necessary to keep rain water out of the dwelling to stop or prevent moisture/mold mildew conditions per DOE Standard Work Specifications	\$100.00

E. Remediation Costs

The maximum allowable expenditure for remediation of health and safety hazards in the District of Columbia may not exceed \$58.82 per residence. This cost is a part of maximum expenditure allowance. US DOE funds are to be used for energy-related health and safety remediation only. Subgrantees should seek other funding to remediate nonenergy related health and safety hazards.

F. Reporting Requirements

Related costs for subgrantees to comply with OSHA requirements are to be charged under a separate health and safety budget category. This policy is issued with the knowledge that as experience is gained in health and safety hazard identification, modifications and improvements to remediation methods will be made.

G. Incidental Repair

Those repairs necessary for the effective performance or preservation of weatherization materials will be addressed. Such repairs include framing or repairing windows and doors that could not otherwise be caulked or weather-stripped, and providing protective materials, such as paint, to seal materials installed under this program. Program policies strictly prohibit roof replacements, structural repairs, or other nonenergy related rehabilitation work. Units requiring this type of repair will be deferred to the District's Department of Housing and Community Development (DHCD) Single Family Residential Rehabilitation Program (SFRRP). All incidental repairs (listing is attached to the SF-424) will be justified in the client file along with an explanation for their need and relationship to a specific energy conservation measure (ECM).

H. Subgrantee Health & Safety Allocation

Historically, DOEE has not had to use the allotted 15% percent in health and safety funds due to the leveraging programs (LIHEAP and District general funds) for which health and safety measures can be covered under program operations. All homes are addressed in a holistic manner and in cases of an SIR greater than 1, the heating or cooling appliances are covered under WAP Program Operations. When the SIR test is not met, DOEE has covered these measures through District general fund programs.

I. ASHRAE 62.2

Implementation of ASHRAE 62.2 is required. Client refusal of mechanical ventilation when evaluated and called for according to the standard must be a deferral. DOEE will utilize the ASHRAE 62.2 2016 standard to the fullest extent possible to meet the minimum requirements for mechanical and natural ventilation intended to provide acceptable indoor air quality in all homes weatherized. The ventilation system may consist of continuously operating bathroom

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and kitchen exhaust fans, a supply-only system or a balanced system. The required airflow is measured following installation of the ventilation system to assure the desired airflow has been achieved.

DOEE used the 62.2-2016 Residential Energy Dynamics (RED) ASHRAE Ventilation calculation. Here is the link

<http://www.residentialenergydynamics.com/REDCalcFree/Tools/ASHRAE6222016>

A copy of the ASHRAE calculation is included in each file and sent to the Subgrantee.

Ventilation for Multifamily Buildings

1. Whole building ventilation rates are applied on per unit basis;
2. No infiltration credit on multifamily buildings;
3. Corridor ventilation of 6 cfm per 100 sq. ft.;
4. All envelope components must be sealed between units;
5. Bathroom or kitchen exhaust fans may also serve as the whole building ventilation fan as long as the fan satisfies the minimum requirements for both the local and whole building ventilation;
6. A single supply fan may serve multiple units if it is continuously operated or if a backdraft damper is included at each unit to prevent cross contamination;
7. An exhaust rate of 4 CFM per 100 sq. ft. is required for attached common garages with an exemption if two or more walls are open to the outside; and
8. All units must have CO & smoke combination units in the following areas.
 - a. Outside of each separated dwelling unit's sleeping area in the immediate vicinity of the bedroom(s); and
 - b. On every level of a dwelling unit, including the basement.

DOEE has implemented a comprehensive Health and Safety Plan to include allowed incidental repairs. Please refer to the Attachment in the SF-424.

Also, DOEE does not approve partial weatherization nor do we reimburse subgrantees until all measures are installed and pass DOEE QCI inspection. Once the Subgrantees submit the reimbursement documentation it is cross referenced with the Funding Source Allocation (FSA) (see SF 424 upload) to ensure funding is allocated correctly prior to payment.

V.8 Program Management

V.8.1 Overview and Organization

In Program Year 1994, the District of Columbia's Weatherization Assistance Program (WAP) for low income households was transferred from the Department of Housing and Community Development (DHCD) to the DC Energy Office. In 2006 under the authority of DC Law 16-51, the Department of Energy and Environment (DOEE) was formed through a merger of the DC Government's Environmental Health Administration, the DC Energy Office, policy functions of the Tree Management Administration and policy functions of the Office of Recycling. The weatherization component operates under DOEE's Energy Efficiency and Conservation Branch (EECB). This agency has accumulated a wealth of experience in operating LIHEAP and WAP weatherization programs. DOEE has utilized proven and effective methods in performing energy audits and has enlisted several subgrantees to implement weatherization activities. Moving forward, DOEE intends to utilize additional auditing tools to enhance program capabilities, including the NEAT and TREAT tools.

A copy of the A-133 is uploaded to the SF -424.

V.8.2 Administrative Expenditure Limits

DOEE adheres to 10 CFR 440 §440.18 (e) which states:

"Not more than 10 percent of any grant made to a State may be used by the grantee and subgrantees for administrative purposes in carrying out duties under this part, except that not more than 5 percent may be used by the State for such purposes, and not less than 5 percent must be made available to subgrantees by States. A State may provide in its annual plan for recipients of grants of less than \$350,000 to use up to an additional 5 percent of such grants for administration if the State has determined that such recipient requires such additional amount to implement effectively the administrative requirements established by US DOE pursuant to this part."

DOEE has determined that the District's subgrantees are not eligible to receive the additional 5%.

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V.8.3 Monitoring Activities

As stated in the U.S. DOE Weatherization Program Notice (WPN) 16-4, (Subject: Updated Weatherization Assistance Program Monitoring Guidance), the goal of the monitoring process is to: (1) ensure the proper and timely use of funds and the realization of expected benefits, (2) provide transparency and accountability, (3) provide quality control, and (4) provide technical assistance and training.

The goals for DOEE's monitoring activities include:

- conducting monitoring with consistency, fairness, respect, and timeliness in a constructive and professional manner;
- fostering positive, open, and constructive working relationships and provide an educational experience that promotes interaction, feedback, and improvement for both the District and the subgrantees of the Weatherization Assistance Program;
- optimizing program funds and resources to best serve the District's low-income population, striving for program improvement, and providing the most cost-effective and best quality program services possible;
- providing programmatic and technical assistance, reinforcing strengths, and sharing successes, innovations, best practices, and experiences encountered by other subgrantees; and
- reporting consistent with, and based upon, adopted program policies, procedures, and standards from US DOE.

Annual Monitoring

DOEE is required to monitor all subgrantees at least once per year in accordance with 10 CFR Part 440. Prior to the monitoring visit, DOEE's On-Site Monitoring Checklist is shared with the subgrantee. During the visit, the Checklist is used to verify the various documents and materials provided by the subgrantee. Both programmatic and fiscal documents and materials are reviewed. A written report is issued to the subgrantee within thirty (30) days of the monitoring visit. The report includes the following categories: findings, concerns, recommendations, and best practices.

A finding may be an observation of non-compliance with a federal regulation, or a repeated or previously identified non-addressed correction or concern. Examples include the misuse of funds, inadequate inventory control, illegal procurement or insufficient insurance.

A concern is either a violation of guidance that is not a regulation, or a correction of a minor problem. Examples include file omissions, failing to follow the State Plan, policies and procedures, or improper training of staff.

Recommendations are suggestions to improve the merits of the program or the identification of opportunities for training and technical assistance (T&TA) or guidance. Improvements or commendations may be noted under recommendations if corrections have been made since the last monitoring visit.

The best practices category notes unique ideas and implementation practices that could potentially be shared with other network partners.

If there are findings, the relevant federal regulation, weatherization program notice (WPN) guidance or the grantee's award documents are cited. The subgrantee has 30 days to provide a written Corrective Action Plan (CAP) to DOEE. Corrective actions may also be requested for any concerns identified. For subgrantees with findings, additional monitoring visits may be scheduled. Files are maintained for all monitoring visits and are available for review by U.S. DOE.

The Monitoring Visit will include, but not be limited to, the review and verification of documentation, implemented procedures, and EEC program operations to help eliminate fraud, waste, and abuse in the following areas:

- Reported expenditures by comparing periodic expenditure reports to a subgrantee's books and records;
 - Reporting and documentation of program income and leveraged funds;
 - Subgrantee financial statements;
 - Source documentation for the purchase of any items charged against DOEE-provided funds;
 - Distribution of costs charged to more than one program;
 - Payroll costs for consistency with the latest approved budgets;

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- o Records to trace material purchases from invoices to inventory, or to specified jobs and to programmatic reports;
- o Bid procedures and records;
- o Subgrantee agreements, analyzing payment schedules to verify payments made to contractors, subcontractors, and vendors;
- o Contractors' cash balances;
- o Subgrantee's internal control structure;
- o Subgrantee's compliance with insurance requirements; and
- o Subgrantee's safeguarding of fixed assets.

Each Subgrantee must provide the EEC Program Manager or Weatherization Branch Chief with copies of the following weatherization documents five (5) days prior to the Monitoring Visit:

- Contractor, subcontractor, and vendor agreements;
- Lease agreements;
- Bids, solicitations for bids, notifications of bid awards, and vendor lists; and
- Books of account, including:
 - o Cash disbursement;
 - o Cash receipts;
 - o Payroll sheets or ledgers;
 - o General ledgers;
 - o General journals;
 - o Monthly general ledger trial balances;
 - o Monthly reconciliation to budget;
 - o Checking account reconciliations;
 - o Bank account authorization signature cards;
 - o List of all unpaid bills tied to the appropriate budget line item for which the cost was incurred; and
 - o Invoices for purchases made with grant funds, program income, and leveraged funds, if applicable.

Periodic Monitoring

In addition to the Annual Monitoring, the Subgrantee and Subcontractors review production, identify obstacles and challenges and develop solutions, identify best practices to meet timelines, and make everyone aware of new mandates and program protocols.

As deemed necessary, DOEE will perform periodic in-person monitoring reviews of the subgrantee's programmatic and field operations. Any and all findings from periodic monitoring reviews will be reported to appropriate DOEE staff and the funding project officer on a monthly basis unless the findings need to be reported immediately to US DOE due to their egregious nature.

The EEC Program Manager will inform the subgrantees of program findings and will require corrective responses in writing. Depending on the severity of any problems reported, a subgrantee may receive a follow-up monitoring review that concentrates on prior deficiencies and required corrective actions. Severe problems will be reported to appropriate DOEE staff and to the US DOE funding project officer. Work may be terminated based on consultations with DOEE and US DOE.

Field Monitoring

Field Monitoring is conducted by DOEE's Quality Control Inspector throughout the year for each subgrantee. Individual job inspections are performed and recorded using the Post Installation Inspection Form. Jobs will be inspected for overall effectiveness, workmanship, appearance, and compliance with the District's Weatherization Field Guide. An overall assessment of the subgrantees field practices are performed using the Standard Work Specification (SWS) Guidelines developed by the National Renewable Energy Laboratory (NREL) and US DOE.

Subgrantee Inspection Responsibilities

Subgrantees are required to inspect 100% of all completed dwelling units to determine compliance with the EEC Programs' quality standards and to ensure proper documentation of client information, job measures and costs, and other appropriate information as needed. The post-installation inspection must be performed by a person who did not perform the actual work on the job.

Although, the subgrantee is required to inspect 100% of the completed projects, DOEE will be the one responsible for conducting 100% in progress and QCI inspections. The QCI inspections are conducted by a DOEE QCI who was not involved in the audit preparation or implementation of audit recommended measures. Since DOEE's program manager also carries the BPI QCI certification he will periodically review the QCI reports to ensure accuracy.

Performance Standards

The levels of performance standards include:

1. High Performance Standard: In order to meet the High Performance Standard, a subgrantee must demonstrate performance standards during the Monitoring Visit

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that meet or exceed those commonly observed in the following areas:

- No more than one health and safety violation as identified in the previous monitoring report;
- No more than one procedural finding related to program rules, policies, and procedures;
- No annual program specific audit findings;
- Accurate monthly reports are always submitted on time; and
- Subgrantee provides comprehensive service in a cost-effective manner in accordance with US DOE guidelines.

2. Standard Performance: In order to meet the Standard Performance threshold, subgrantees must meet the Standard Performance requirements:

- Comply with major program requirements (i.e., lead-based paint procedures, cost allocation plan/indirect rate, and required contractor information);
- Receive no more than one specific program finding in the annual audit;
- Ensure that staff is well trained in performance standards and specific job duties;
- Maintain complete and organized files;
- Complete all required scopes of work;
- Ensure that all contractors, subcontractors, and vendors have demonstrated proficiency in technical applications including diagnostics;
- Comply with all applicable safety rules;
- Maintain a professional working relationship with DOEE;
- Resolve all prior findings and report such corrections to DOEE in a timely manner; and
- Verify that none of the elements identified in the At-Risk Performance category (below) are present.

3. At-Risk Performance: DOEE may categorize a subgrantee under At-Risk Performance for serious management and/or sub-standard field performance, including but not limited to the following findings:

- Unmet program goals;
- Misplaced or unaccounted-for program resources;
- Serious indications of misuse of funds, fraud, or theft;
- Non-compliance with program policies and procedures;
- Severely incomplete or disorganized files or records;
- Repeated major field findings with little to no improvement over a previous Monitoring Visit; and
- Delayed or unresponsive behavior in regards to DOEE requests and deadlines.

Once a subgrantee has been designated as At-Risk Performance status, DOEE will provide specific improvements that must be made by the subgrantee. The subgrantee will be instructed to submit a plan to identify the steps and timelines to be taken to make the noted improvements. When appropriate, related training and technical assistance will be provided by DOEE.

If the specified improvements in management or field practices are not instituted by the subgrantee within a specified period of time, DOEE will consider suspension or termination of the subgrantee agreement. DOEE will report At Risk subgrantees to US DOE immediately.

Appeals of Monitoring Reports

A subgrantee may appeal the findings of a DOEE Monitoring Visit to the EEC Branch Chief. This appeal should be sent in writing within thirty (30) days of receipt of

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the inspection report.

A subgrantee may submit a subsequent appeal to the Affordability and Efficiency Division Associate Director.

V.8.4 Training and Technical Assistance Approach and Activities

Training and Technical Assistance (T&TA) activities are intended to maintain and increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels. DOEE developed an internal Subgrantee Training Plan based on US DOE recommendations, monitoring visits, and field inspections. The Training Plan ensures that all Tier 1 training paid for with WAP T&TA funds for the subgrantee meets the requirements of the Weatherization Program Notice 15-4, Section 4.

DOEE links subgrantees to training resources throughout the year on a variety of energy-related topics. When topics involve a change in existing policies and procedures (e.g., new database, changes to audit protocols), or emphasize a major program area, subgrantee attendance may be mandatory. When training is mandatory, all parties are expected to assign the most appropriate person to attend. If a subgrantee has any doubt regarding attendance, DOEE requires that it be consulted immediately.

The following training sessions are mandatory for the positions stated below. If a subgrantee hires a new employee into one of these positions or current employee transfer into one of these positions, it is mandatory that the person receives this training within six months of their start date (unless they have already received it). These mandatory training sessions must be repeated every three years by subgrantee personnel who occupy these positions:

Inspector

- BPI Building Analyst Certification
- Quality Control Inspection Certificate of Completion from an IREC Accredited Facility
- Moisture and Mold Awareness
- Envelope and Duct Leakage
- Lead Safe Work Practices
- 10 Hour OSHA
- ASHRAE 62.2-2016

Installer

- Retrofit Installer Technical Certificate of Completion from an IREC Accredited Facility
- HVAC Fundamentals Certificate of Completion from an IREC Accredited Facility
- HVAC Duct Sizing Certificate of Completion from an IREC Accredited Facility
- Moisture and Mold Awareness
- Envelope and Duct Leakage
- Lead Safe Work Practices
- 10 Hour OSHA
- ASHRAE 62.2-2016

Crew Leader

- BPI Building Analyst Certification
- Crew Leader Certificate of Completion from an IREC Accredited Facility
- 30 Hour OSHA
- Moisture and Mold Awareness
- Envelope and Duct Leakage
- Lead Safe Work Practices
- 10 Hour OSHA
- ASHRAE 62.2-2016

Health and Safety courses, as outlined in the Training Plan (attached to SF424), will be conducted by DOEE personnel or subcontractors. The Training Plan requires certification to be submitted 120 Days after the Grant Award Notice. The certifications are tracked through our internal database system.

Based on performance, subgrantee and DOEE personnel may be required to take additional training courses prior to continuing weatherization activities. An analysis will be conducted to determine if the work performed did not meet the standard based on a "one-time" error or if a pattern of poor performance exists. In instances where poor performance is identified as a pattern, subgrantees are required to complete Tier 1 and 2 training activities within the next 60 days after being informed of the findings.

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The selected subgrantee's in-house personnel and/or subcontractors will receive the necessary training to be in compliance with DOEE training plan once the funding becomes available. Community Housing Partners, an IREC accredited facility, will continue to provide subgrantees with the necessary training to stay abreast of any new program guidance and/or updates as needed. The current T&TA budget reflects the projected costs to train subcontractors and in-house personnel so they may be in compliance with DOEE standards. DOEE Request for Applications (RFA) outlines the training requirements, and each subgrantee is required to adhere to this by signing their grant award. During the DOEE monitoring visit, DOEE requests the listing of all training their subcontractors and/or in house crews attended and obtained certification for if they differ from the personnel on board at the time of their proposal submission.

DOEE's QCI will maintain their BPI certifications to ensure compliance. DOEE required all applicants for the FY18 program to have the above training completed before applying for funding. DOEE requires this in its RFA and the Training Plan attached to the SF424. DOEE internal staff currently includes five (5) BPI certified QCIs.

Leveraged funds have been allotted to provide staff with the necessary training courses, and US DOE's T&TA funds will be utilized to attend US DOE-recommended conferences. T&TA funds may be used to train DOEE staff and subgrantee contractors except in cases where the employee has already failed the certification two times. T&TA funds will only be used to retake the exam one time, and the employee is required to cover the cost to take the exam additional times. In making the determination to pay for contractor training, subgrantees must formally agree with their contractors that, in exchange for training the contractors will work in the DOEE WAP Program for minimum of one (1) additional program year after training is completed, to align with the cost of the T&TA provided. DOEE requires subgrantee(s) to submit training request(s) to the DOEE Program Manager for approval before spending US DOE T&TA Funds (see the Training Request Form attached to SF424).

DOEE offers training courses. When a subgrantee's staff is unable to attend, they must still meet the requirement for certification within 90 days of the Grant Award Notice.

DOEE determines the subgrantees' effectiveness, skills, and abilities through the field and programmatic monitoring activities. The goal is to determine whether US DOE funds are being used to the maximum extent possible on energy efficiency and conservation measures. Also, the Subgrantee is required to show adequate proof of client education and utilization of leveraging opportunities to address applicants in a holistic approach.

V.9 Energy Crisis and Disaster Plan

The District's Energy Assurance Plan provides information on how the District and DOEE will respond in case of an energy emergency. The Energy Assurance Plan promotes the resilience of the District's energy systems in order to reduce the system's vulnerabilities. The Plan also outlines DOEE's role in promoting policies and programs that enhance the District's energy systems.

The Plan addresses:

1. The types of energy emergencies that can occur in the District;
2. Who responds to an energy emergency;
3. Plan of action when an energy emergency occurs; and
4. Development related to critical infrastructure and promoting policies and program that enhance the resiliency of District energy systems.

The Energy Assurance Plan is attached to the SF424. If there are any changes or updates they will be sent to US DOE's Project Officer for review.